

REMARKS

This timely responds the Office Action mailed July 14, 2003. Claims 1-25 are currently active in this application, of which claims 1, 4 and 10 are independent. The Office Action indicates that claims 4-25 have been allowed.

Based on the following Remarks, Applicants respectfully request that the Examiner reconsider the outstanding rejection and it be withdrawn.

Rejections Under 35 U.S.C. §103

In the Office Action, claims 1-3 have been rejected under 35 U.S.C. §103(a) for being unpatentable over U. S. Patent No. 6,292,239 issued to Nagamura, *et al.* (“Nagamura”) in view of Japanese Patent Publication No. 11-133401 to Susumu, *et al.* (“Susumu”) and further in view of U. S. Patent No. 5,815,227 issued to Lee (“Lee”). This rejection is respectfully traversed.

Independent claim 1 recites “... a mold frame having a first frame ... and a second frame for receiving the light source, wherein the second frame has a groove formed on a side facing the light guiding plate for receiving the light source”.

In the Office Action, the Examiner admitted that “Nagamura does not expressly disclose the mold frame having a first frame ... and a second frame for receiving the light source, and the second frame has a groove formed on a side facing the light guiding plate for receiving the light source” (Office Action, Page 30). Also, the Examiner admitted that “Susume does not expressly disclose that the second frame (light source frame) has a groove formed on a side facing the light guiding plate” (Office Action, Page 30).

Regarding this missing feature, the Examiner asserted “Lee discloses ... that a lamp cover functions as a light source frame and the open side of the lamp cover ... is coupled with

the light-inducing plate ...” (Office Action, Page 30). Based on this, the Examiner alleged that “it would have been obvious ... to use two frames as claimed in claim 1 for achieving easily exchanging the light source”. This assertion is respectfully disagreed with.

First, independent claim 1 recites “a mold frame having a first frame ... and a second frame for receiving the light source”. In other words, it is the mold frame that has the first frame and the second frame.

In this regard, Lee does not disclose that the lamp cover 125 is a mold frame. As described in Lee, that the lamp cover 125 is a cover that is “installed to enclose the outer circumferential surface of lamp structure 120” (Column 2, Lines 66-67). The Examiner is respectfully request to determine if the lamp cover 125 is indeed a mold frame or not.

As shown in FIG. 3 of Lee, “support 135 which shields the side and bottom surfaces of lamp cover 125 to support a subassembly constituted by light inducing plate 105, lamp structure 120 and lamp cover 125” (Column 3, Lines 2-5). Thus, the lamp cover 125 may be a part of a back light assembly which is supported by a mold frame, but would not be the mold frame itself that support the back light assembly. If the lamp cover 125 is a mold frame, it would not be necessary for the support 135 (which appears to be a mold frame) to cover the lamp cover 125 for protection, as shown in FIG. 3. Thus, it is submitted that the lamp cover 125 is not a mold frame.

Second, the Examiner has not logically explained how the combination of Lee and Susumu would satisfy “second frame has a groove formed on a side facing the light guiding plate for receiving the light source”. Based upon Applicants’ careful review, if the lamp cover 125 is combined with the metallic protection cover 46 (e.g., asserted second frame), the resulting structure would be the lamp cover 125 mounted on the reflection plate 47 of the metallic

protection cover 46. Thus, the resulting structure does not satisfy "the second frame has a groove formed on a side facing the light guiding plate for receiving the light source" as claimed. The Examiner is respectfully requested to determine if the asserted combination would actually result in the claimed second frame.

Third, it is submitted that there is no motivation for the asserted combination. In Lee, the lamp cover 125 is attached to the light inducing plate 105 to constitute a back light assembly unit. The assembled unit is then placed on the support 135 which appears to be a mold frame. However, in Susumu, the light guiding plate 26 is attached to the supporting frame 24 (asserted first frame) and the lamp assembly is attached to the metallic protection cover 46 (asserted second frame). Then, the metallic protection cover 46 is inserted into the groove 38 formed in the edge portion of the supporting frame 24.

For this reason, the module structure described in Susumu involves a totally different assembly mechanism from that of Lee. Thus, selectively adopting the lamp cover 114 to the metallic protection cover 46 exhibits no advantage or necessity. Rather, such modification would disturb the assembly mechanism of Lee. Hence, Applicants submit that there is no motivation for the asserted combination of Lee and Susumu.

As described above, none of the cited references discloses or suggest the claimed second frame that is a mold frame and has a groove formed on a side facing the light guiding plate for receiving the light source". Thus, it is submitted that claim 1 is patentable over Nagamura, Susumu and Lee. Claims 2 and 3 that are dependent from claim 1 would be also patentable at least for the same reason.

CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, claims 1-25 are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,



Maryam M. Ipakchi
Reg. No. 51,835

Hae-Chan Park
Reg. No. 50,114

Date: September 22, 2003

McGuireWoods LLP
1750 Tysons Boulevard
Suite 1800
McLean, VA 22102-4215
Tel: 703-712-5365
Fax: 703-712-5280
HCP:WSC/bjb

\COM\214562.1